

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
JORDAN WEXLER, on behalf of
himself and all others similarly
situated,

Plaintiff,
-against-
ASSOCIATED CREDIT SERVICES, INC.,
Defendant.

ANSWER
14-CV-2032

-----x
Defendant, Associated Credit Services, Inc., by its attorney,
Arthur Sanders, Esq., answers plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair Debt Collection Practices Act, but denies any violation thereof.
2. This paragraph contains no factual allegations directed at the defendant and does not require an admission or denial.
3. Defendant admits the allegations contained in paragraph "3" of the complaint.
4. Defendant admits the allegations contained in paragraph "4" of the complaint.
5. Defendant admits the allegations contained in paragraph "5" of the complaint.
6. Defendant admits the allegations contained in paragraph "6" of the complaint.
7. Defendant admits the allegations contained in paragraph "7" of the complaint.

8. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "8" of the complaint.

9. Defendant admits the allegations contained in paragraph "9" of the complaint.

10. Defendant denies each and every allegation contained in paragraph "'10" of the complaint.

11. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "11" of the complaint.

12. Defendant repeats and realleges its previous admissions and denials contained in paragraphs "1" through "11" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. This paragraph contains no factual allegations directed at the defendant and does not require an admission or denial

15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.

17. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "17" of the complaint.

18. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "18" of the complaint.

19. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "19" of the complaint..

20. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "20" of the complaint.

21. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "21" of the complaint.

22. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "23" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

24. Pursuant to 15 U.S.C. Section 1692k©, to the extent a violation is established and in the event Associated Credit Services, Inc. is found to be a debt collector as defined in the FDCPA, which is specifically denied, any such violation was not intentional and resulted from a bona fide error, notwithstanding the maintenance of procedures reasonably adapted to avoid such error.

Associated Credit Services, Inc. trains its employees on compliance procedures and regularly reviews and updates its procedures. In the event Associated Credit Services, Inc. is found to have violated the FDCPA. Which is specifically denied, any such violation was no intentional and resulted from a bona fide error, notwithstanding the maintenance of procedures reasonably adapted to avoid such error.

WHEREFORE, defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New City, NY

May 12, 2014

/S/Arthur Sanders

ARTHUR SANDERS, ESQ.

Attorney for defendant

30 South Main Street

New City, NY 10956

845-499-2990

To:

SHIMSHON WEXLER, P.C.

Attorney for plaintiff

216 West 104th Street, #129

New York, NY 10025